

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MARTY PAUL, an individual; and
BRIAN BUSKIRK, an individual,

Plaintiffs,

v.

RBC CAPITAL MARKETS, LLC, a
Minnesota limited liability company;
ROYAL BANK OF CANADA, a
Canadian corporation; and ROYAL
BANK OF CANADA US WEALTH
ACCUMULATION PLAN, an employee
benefit plan,

Defendants.

No. 3:16-cv-05616-RBL

STIPULATED MOTION FOR
PROTECTIVE ORDER

Note on Motion Calendar:
November 4, 2016

Pursuant to LCR 26(c)(2), plaintiffs Marty Paul and Brian Buskirk (“Plaintiffs”) and defendants RBC Capital Markets, LLC, Royal Bank of Canada, and Royal Bank of Canada US Wealth Accumulation Plan (“Defendants”) (Plaintiffs and Defendants collectively, “the Parties”) move this Court for an order to protect confidential, proprietary, and private information that warrants special protection.

The Stipulated Motion and [Proposed] Protective Order the Parties request that the Court enter is attached to this Motion as Exhibit 1. The only departures from the Western

District of Washington's model protective order are in Section 2 and Section 9 of the order.
As required by LCR 26(c)(2), attached hereto as Exhibit 2 is a redline version of the order
identifying departures from the model order.

DATED: November 4, 2016

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*Attorneys for Defendants RBC Capital
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date, I electronically filed the foregoing document with
3 the Clerk of the Court using the CM/ECF system, which will send notification of such filing
4 to the following:

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21 *Attorneys for Defendants RBC Capital*
22 *Markets, LLC, Royal Bank of Canada, and*
23 *Royal Bank of Canada US Wealth*
24 *Accumulation Plan*

25 I declare under penalty of perjury under the laws of the State of Washington that the
26 foregoing is true and correct.

Dated: November 4, 2016, at Seattle, Washington.

s/Sue Stephens

Sue Stephens, Legal Assistant